



September 22, 2017

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville, MD 21032-2023

Dear Ms. Hughes:

We very much appreciate that you and your staff members Tim Tamburrino and Beth Cole came to meet with us in Garrett Park on September 9 and to tour our proposed sidewalks project. We know that it used a substantial portion of your day and we are grateful that you were willing to spend that time to understand the factors which affect the project. We also hope that our dedication to preserving the historic character of our town while assuring the safety of our residents, particularly children, was apparent. Our town is a wonderful oasis of beauty and calm with a true sense of community within the Washington, DC suburbs. We take both our status as a National Historic District and as an arboretum very seriously.

At that meeting, Mr. Tamburrino passed out a list of items to be discussed in this letter to you. In effect, he was asking us to update the submission we made to you in June, 2016. The update is attached. In the previous submission we responded substantively and in detail to the Maryland Historical Trust letter to the Town of November 13, 2013. We showed in that document that we have carried out the analyses the Trust suggested, and have paid close attention to preserving the existing landscape and to integrating the proposed sidewalks into the visual integrity of the streetscape.

Since the last submission to MHT the Town has been able to obtain the services of an engineering contractor that has been sensitive and responsive to the Town's expressed goals and criteria in developing the sidewalk project, which include the issues which MHT has raised. In July we sent you the 65% design drawings developed by those engineers, and which we believe reflect the Town's and MHT's values. The drawings are also included in the attached update and are available on the Town website (click) or go to <http://www.garrettparkmd.gov/government/operations/projects/sidewalks>.

In parallel with the development of the 65% design drawings the Town and its engineering firm were discussing with Montgomery County how best to meet the County's stormwater management requirements. It was decided that the most effective action would be to carry out a project to prevent the erosion caused by the prior placement of a stormwater pipe at a point located off Clermont Avenue where the pipe empties into an open gully in the Town-owned Porcupine Woods Park. You have seen this location on your tour of the project. The stormwater project has been approved by the County and is also shown on the above website, items SR01 and SWM Concept Approval. While the sidewalk project itself will be built entirely on Town right of way and will not require the use of any private property, it was necessary to obtain an easement to implement the stormwater management component.

Consequently one private property, 10919 Clermont Avenue, within the boundary of the National Register listed Garrett Park Historic District will be directly impacted through acquisition of a perpetual easement for future maintenance of the stormwater outfall located off of Clermont Avenue. This property is just beyond the borders of the Montgomery County Garrett Park Historic District, and was not included either within the district or as a separate historic property, as other houses were. The home was built in 1925 and extensively renovated and expanded in 1985. There has been no finding that the property is individually eligible or a contributing element to the Garrett Park Historic District. With regard to Section 4(f), it is FHWA's policy that when a project requires land from a non-historic, non-contributing property lying within a historic district, there is no direct use of the historic district for purposes of Section 4(f). Therefore, we request your concurrence that 10919 Clermont Avenue is not individually eligible nor a contributing element to the Garrett Park Historic District.

The 65% design plans show the impact of the project on trees. Four trees will be removed and replaced, as recommended by the Town Arboretum Committee. This includes one very old and large tulip poplar which is in declining health and would have to be removed soon anyway, one small pin oak in declining health, one red maple in declining health, and one very small maple which will either be transplanted or replaced. One tree was not specifically identified by the Arboretum Committee, but is shown for removal on the plans at the request of the homeowner. Consistent with Montgomery County requirements, the Town will plant 17 new trees at the completion of the project. Consequently only one substantial mature tree will be removed and more than three times as many trees will be planted for the project than are removed.

The items that Mr. Tamburrino asked us to discuss and our responses follow:

Reiterate the project's purpose and need. The purpose of the project is clearly stated in Section 1 of the submission, page 3. The need, identified in this section, is expanded upon in Section 2, pages 8 through 12.

Discuss the extensive community outreach and involvement. Section 8, pages 29 through 33, discusses this subject in great detail. In summary, the Town of Garrett Park government believes that the process of applying for and obtaining a grant to build the sidewalk project, and the decision making in carrying out all elements of the project design have been conducted in an extraordinarily open and participatory manner, with access to all parts of the process and the ability to comment on issues afforded to town residents, consulting parties, Town committees, and Federal, State, County, and local agencies and regulatory bodies.

Explain the alternatives considered and dismissed. Section 5, pages 20 through 23, describes many of the alternatives to building sidewalks considered. Two of the alternatives were implemented to determine their effect:

- Install more speed limit signs The speed limit throughout town is 20 mph, and signs are posted at all entry points to the town. This proposal was adopted by the Town, with an increased number of speed limit signs deployed. It has not resulted in any noticeable change in driver behavior.
- Install Stop Signs at Intersections on Oxford This proposal is a possible way to encourage caution and control speeds along Oxford to, at a minimum, increase pedestrian protection while crossing streets at corners. The Town has placed several additional stop signs and stop lines along Oxford and intersecting streets, and has repainted pedestrian crossing markings. At the intersection of Kenilworth and Oxford, which has sidewalks and is beyond the limits of this proposal, it appears to have had a salutary effect. The observed result elsewhere is that cars are slowing down at intersections, with a few stopping, and then gunning their engines after the intersection. It may have increased safety at the intersections, but does not appear to have done so between them.

The remainder of the alternatives are discussed in the section cited. Section 6, pages 24 through 26, discusses alternatives to designs and materials. There are two significant changes:

- Tinted Concrete This option was specifically called out in the letter sent by the Trust as one to be considered and is the preferred choice of the Town. The tinting can overcome the bright white glaring effect of newly-poured concrete, and make the sidewalk look as though it has been there for a long time. This proposal originally included making sidewalks from exposed aggregate concrete, which has a look more like concrete mixes that were used in previous years and also has the look of a surface that has aged. It is substantially more expensive to install and maintain and has a shorter life span than regular concrete. After much consideration, the Town has opted not to use aggregate unless the Maryland Historical Trust has an extremely strong preference for it.

- Vertical Curbs Both the Town Sidewalk Citizens Advisory Committee and the Town Historic Advisory Committee have indicated a preference for vertical curbs in some locations. There is some concern that mountable curbs may be a safety concern because cars and trucks can drive over them onto the surface beyond, posing a potential hazard to pedestrians. This option has been discussed with the Maryland Historical Trust and residents along the sidewalk routes have been surveyed for their preference. As a result, the Town is opting for rolled concrete curbs throughout the project, as preferred by MHT.

Describe ways the Town has addressed community comments and MHT comments. The Town has gone out of its way to solicit input from residents, experts in various fields, and agencies, including MHT. In all cases the Town has listened carefully, weighed the options, in some cases conducted experiments, and throughout sought ways to preserve and protect the characteristics that we value so much in our town that make it a special place. We believe that you have experienced that process in our interactions with MHT. The attached submission reflects those considerations, and the results, in summary are:

- The entire sidewalk project will be built totally within existing Town right of way. No private property will be used, historic or otherwise. The associated stormwater management project does require an easement, which has been obtained from a homeowner who is anxious to control the erosion which is directly affecting that property.
- Sidewalks will have gentle curves where possible to be consistent with the curving nature of the town's roadways.
- Sidewalks and curbs will be tinted (colored) concrete to allow them to fit into the visual landscape and avoid the jarring effect of bright white smooth concrete. Curbs will be rolled concrete (curved shape rather than angular) to give them a more gentle appearance.
- In the entire project, only four trees will be removed and replaced, as recommended by the Town Arboretum Committee, and will not have a significant effect upon the town's tree cover, and an additional tree will be removed at the request of the homeowner. All of the trees of any size which are close to the sidewalk will get tree root bridges to protect their roots. At the conclusion of the project 17 trees will be planted to meet Montgomery County requirements.
- The Town has met with adjacent property owners after the preliminary design completion and again after the 65% design completion to solicit their comments on how best to integrate the sidewalk into the land adjacent to their property. The Town has promised those adjacent property owners that it will work with them to move or replace shrubbery which they have planted within the Town right of way

- The Town has considered and documents alternatives to sidewalks and alternatives to the proposed plan in the attachment.
- The Town has paid special attention to the suggestions made by the Maryland Historical Trust in its letter of November 25, 2013 and documents how the plan responds to these suggestions in the attachment.

From its earliest stages, this project has been conducted in a transparent and open manner, with extensive community outreach and involvement. Between the decision to apply for the grant by unanimous vote in an open meeting of the Council in December, 2012 and the vote by the Council in February, 2016 to reaffirm its unanimous decision in September, 2013 to implement the project there have been five formal hearings on whether to conduct the project; one open meeting for the 89 consulting parties on historic preservation and other interested persons to discuss its potential impact upon the historic character of the town; 48 opportunities to make presentations on the topic to the Town Council at its monthly meetings (at 11 of which such presentations were made); numerous open meetings of the Sidewalks Citizens Advisory Committee, the Historic Preservation Committee and the Arboretum Committee to discuss this project; 35 email notices to residents about aspects of the project, discussions about the project, or potential decisions of the Council; 22 times when the monthly town newsletter reported on discussions of the subject in Council meetings; 12 times when the Letter from the Mayor included in the town newsletter contained discussions, progress reports, or explanations of the project; and continuous displays of the project status and upcoming meetings on the Town web site. A sidewalks project page was established on the Town web site and a special email address was created to allow residents to comment to the mayor and council members about the project.


Explain the aspects of the project that minimize impacts to the aesthetic qualities of the town and that are context-sensitive (curvilinear path, exposed aggregate material, root bridges, tree survey to avoid removing healthy trees, etc.) These elements are discussed in other parts of this letter and many are detailed in Section 7, pages 26 through 28 of the attached submission.

Introduce stormwater management part of the project with description and purpose of facility. This has been included in the discussions, above, of this letter and in the attached submission.

Provide the Town's assessment of project effects (i.e. not adverse or adverse). We value highly the historic character of our town and wish to preserve it as custodians of a town we love who will pass it on to those who will experience it in the future. We believe that in this letter and in the attached document we clearly demonstrate that the proposed sidewalk project, far from being a detriment to the character of the town, is, in fact, fully consistent with the history of the town's development from the very beginning,

is a logical continuation of a sidewalk network which has existed long before the town became a National Historic District, and will be constructed in a manner which honors the original design of the town, protects the existing landscape and tree cover, minimizes visual intrusion, and respects and reflects the historic character of the town. Therefore, we request your concurrence with our determination that this proposed sidewalks project and associated stormwater management element in the Town of Garrett Park will have no adverse effect on historical or archeological resources. As mentioned earlier, we also request your concurrence that 10919 Clermont Avenue is not individually eligible nor a contributing element to the Garrett Park Historic District. We would appreciate a response to this request by October 23rd so that we may proceed to final design. Please contact us if there are still any issues to resolve.

Sincerely,



Peter Benjamin
Mayor

cc: Beth Cole
Timothy Tamburrino
Gregory Slater
Christy Bernal
Caryn Brookman
Gene Swearingen
Hans Wegner
Consulting parties for this project